

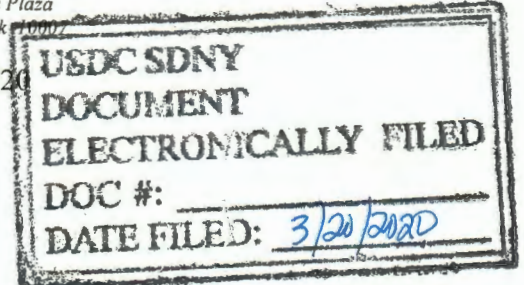


U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 18, 2020



BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Alberto Marte et al.*, 19 Cr. 795 (SHS)

MEMO ENDORSED

Dear Judge Stein:

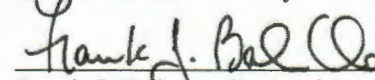
This case is currently scheduled for a status conference on Monday, March 23, 2020 at 2:30 p.m. In light of the coronavirus / COVID-19 pandemic, and the preventative measures being taken across the District and country, the Government respectfully requests that the conference be adjourned at least two weeks. Nearly all defense counsel in the case have conveyed their consent to this adjournment, and several have expressed that a longer adjournment—perhaps one month or more—is warranted under these unique circumstances. The Government does not object to a lengthier adjournment if the Court deems it appropriate.

The Government also respectfully requests that, in the interests of justice, time between March 23, 2020 and ^{May 23, 2020} ~~the next conference date~~ be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). This time will allow the defense to continue reviewing the voluminous discovery with an eye towards potential motions or defenses. It will also allow the parties to continue plea discussions, which have been ongoing with nearly all defendants. Finally, the health of court personnel, counsel, the defendants, and other inmates weighs in favor of adjourning this multi-defendant conference, as recognized by Chief Judge Colleen McMahon's Standing Order of March 13, 2020, Dkt. 20 Misc. 154. At the time of this filing, most defense counsel have conveyed their consent, and none has objected.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

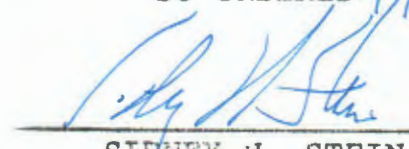
By:


Frank J. Balsamello / Adam Hobson
Assistant United States Attorneys
(212) 637-2325 / -2484

The conference is adjourned to May 23 at 3:30 pm

cc: All counsel of record (via ECF)

SO ORDERED ^{3/20/2020}


SIDNEY H. STEIN
U.S.D.J.